

DEFENSE CONTRACT AUDIT AGENCY 8725 JOHN J. KINGMAN ROAD, SUITE 2135 FORT BELVOIR, VA 22060-6219

30 January 1996 96-PSP-013(R)

PSP 730.4.7.1

MEMORANDUM FOR REGIONAL DIRECTORS, DCAA DIRECTOR, FIELD DETACHMENT, DCAA

SUBJECT: Audit Guidance on DCAA Participation in the Common Process Initiative

BACKGROUND

The Secretary of Defense recently issued a memorandum (Enclosure 1) encouraging contractors to replace multiple government-unique management and manufacturing systems with common, facility-wide systems. This initiative is often referred to as either the common process, single process, or block change initiative. The guidance memorandum on this initiative from the Under Secretary of Defense for Acquisition and Technology (Enclosure 2) directs the use of an expedited, streamlined approach for reviewing contractors' concept papers to adopt common processes. The guidance recommends a 120 day target for reviewing the concept paper and making contract block changes.

The Defense Contract Management Command (DCMC) will manage the initiative for the Department. The Administrative Contracting Officer (ACO) will lead the review of the concept papers and execute block changes to authorize the use of beneficial common processes on existing contracts. DCMC's guidance on the initiative is attached as Enclosure 3.

AUDIT GUIDANCE

Concept papers on proposed changes to common processes will include a cost/benefit analysis to present the savings on existing and future contracts. The cost/benefit analysis is intended to be an inexpensive general dollar magnitude estimate of the savings. This estimate is similar to that used in determining if a cost impact proposal is required when a contractor covered by the cost accounting standards makes a change to its disclosed accounting practices.

DCAA field audit offices should provide any financial advisory and audit services needed by the ACO to review the concept paper. Auditors should not request detailed cost or pricing data when reviewing the general magnitude estimate. The detail supporting the general magnitude estimate is intended to be the minimum amount needed to allow an informed, rapid judgment on whether proposed changes can be approved on a no-cost, block change basis. If the concept paper general dollar magnitude estimate shows substantial savings on existing contracts, the contractor will be required to submit equitable adjustment proposals after the block changes have been made.

Contractors are not expected to spend significant money to prepare the concept papers. Contractors' labor costs for preparing concept papers will normally be an allowable indirect cost.

SUBJECT: Audit Guidance on DCAA Participation in the Common Process Initiative

Management councils will be established at each contract administration office to facilitate the review of the concept papers. The council membership will include contractor, DCMC, and DCAA representatives, as well as representatives from key customer buying activities. The FAO manager will be DCAA's representative on the council.

CONCLUDING REMARKS

DCMC will establish "SWAT teams" at selected district, plant, and area offices to assist ACOs in reviewing the concept papers, if any additional support is needed by the local DCMC and DCAA offices. DCMC has requested DCAA participation on these teams. We recommend that the regional special programs office provide the staffing for DCAA's participation. DCMC has not yet formulated the details and logistics on the SWAT teams. Upon receipt, we will coordinate with the regional offices.

DCMC has established a Block Change Management Team at the headquarters level to manage the initiative. Special Project Division program managers are members of the Team. As the Team generates new information and guidance on the initiative, we will disseminate it to the field.

This initiative will need innovative approaches by both the government and the contractor to be successful. We expect the guidance will evolve as the initiative progresses. As a result, Policy and Plans will establish a "help line" in the Special Projects Division to provide timely assistance to the regions and FAOs. The "help line" number is (703) 767-3290.

For Lawrence P. Uhlfelder

Assistant Director Policy and Plans

best Di Mucco

Enclosures

- 1. Secretary of Defense Memorandum
- 2. USD(A&T) Memorandum
- 3. DCMC Memorandum

DISTRIBUTION: C



THE SECRETARY OF DEFENSE WASHINGTON, DC 20301-1000

6 DEC 1995

MEMORANDUM FOR SECRETARIES OF THE MILITARY DEPARTMENTS
CHAIRMAN OF THE JOINT CHIEFS OF STAFF
UNDER SECRETARY OF DEFENSE (ACQUISITION AND
TECHNOLOGY)
UNDER SECRETARY OF DEFENSE (COMPTROLLER)
ASSISTANT SECRETARY OF DEFENSE (COMMAND,
CONTROL, COMMUNICATIONS AND INTELLIGENCE)
GENERAL COUNSEL
INSPECTOR GENERAL
DIRECTOR OF OPERATIONAL TEST AND EVALUATION
DIRECTORS OF DEFENSE AGENCIES

SUBJECT: Common Systems/ISO-9000/Expedited Block Changes

My June 29, 1994 memorandum on Specifications and Standards directed the use of performance specifications to the maximum extent practicable, and the development of a streamlined procurement process to modify existing contracts to encourage contractors to propose non-government specifications and industry-wide practices that meet the intent of military specifications and standards which impose government-unique management and manufacturing requirements. Although much progress is being made in applying these principles on new contracts, this progress has itself shown that government-unique requirements on existing contracts prevent us from realizing the full benefits of these changes by requiring, in a single facility, multiple management and manufacturing systems designed to accomplish the same purpose. Because it is generally not efficient to operate multiple, government-unique management and manufacturing systems within a given facility, there is an urgent need to shift to facility-wide common systems on existing contracts as well.

In order to meet our military, economic and policy objectives in the future, and to expedite the transition to this new way of doing business, the direction given in my June 29, 1994, memorandum is hereby revised. In addition to the direction given there for government-unique specifications and standards, I now direct that block changes to the management and manufacturing requirements of existing contracts be made on a facility-wide basis, to unify management and manufacturing requirements within a facility, wherever such changes are technically acceptable to the government. The single point of contact for this effort will be the Administrative Contracting Officer (ACO) assigned to a facility.

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The Under Secretary of Defense for Acquisition and Technology shall issue additional guidance necessary to facilitate the Department's streamlined review of contractor's proposals to replace government-unique management and manufacturing requirements in existing contracts with uniform requirements within the contractor's facilities.

We cannot afford to allow "business as usual" to delay this initiative. I therefore request that you and your leadership take an active role in expediting the transition of existing contracts and reprocurements to common systems.

William J leny



THE UNDER SECRETARY OF DEFENSE 3010 DEFENSE PENTAGON WASHINGTON, D.C. 20301-3010



DEC 0 8 1995

MEMORANDUM FOR SECRETARIES OF THE MILITARY DEPARTMENTS
CHAIRMAN OF THE JOINT CHIEFS OF STAFF
UNDER SECRETARY OF DEFENSE (COMPTROLLER)
ASSISTANT SECRETARY OF DEFENSE (COMMAND,
CONTROL, COMMUNICATIONS AND INTELLIGENCE)
GENERAL COUNSEL
INSPECTOR GENERAL
DIRECTOR OF OPERATIONAL TEST AND EVALUATION
DIRECTORS OF DEFENSE AGENCIES

SUBJECT: Single Process Initiative

Secretary Perry's memorandum of December 6, 1995 requested that I promulgate guidance for making block changes to existing contracts to unify the management and manufacturing requirements of those contracts on a facility-wide basis, wherever such changes are technically acceptable to the government. Secretary Perry further directed that the single point of contact for this effort will be the Administrative Contracting Officer (ACO) assigned to a facility. Accordingly, I am providing the following additional guidance on these issues.

Replacement of multiple government-unique management and manufacturing systems with common, facility-wide systems should, in the long run, reduce the costs to both our contractors and the DoD. Contractors will, however, in most cases incur transition costs that equal or exceed savings in the near term. We expect that cases where this does not hold true are in the minority, mostly dealing with high value, long-term contracts. Accordingly, I direct use of an expedited, streamlined approach to ensure that the contractors' proposals of block changes are technically acceptable and to quickly identify those cases where there may be a significant decrease in the cost of performance of existing contracts.

ACOs are directed to encourage contractors to prepare and submit concept papers (see the attached TAB A) describing practices that will permit uniform, efficient facility-wide management and manufacturing systems and a method for moving to such systems. Contractor recommendations included in the concept paper should be accompanied by a cost-benefit analysis adequate to determine the rough order of magnitude of the costs and benefits to the contractor of the proposed system changes (including any impact on the cost of performance of existing contracts). This cost benefit analysis shall be performed without requesting certified cost or pricing data. The detail included in these concept papers/cost analyses is intended to be just sufficient to allow an informed,



rapid judgement by the ACO on whether proposed changes to management and manufacturing processes can be approved on a nocost, block change basis, applying guidance in this letter.

Where such a proposal is technically acceptable and there are no significant net savings in the cost of performing existing contracts, the ACO, after appropriate consultation with program managers, shall issue class modifications to those contracts without seeking an equitable adjustment. In those cases where the contractor's proposal will result in significant decreases in the overall net cost of performance of existing contracts, the contractor should be asked to submit a formal proposal for an equitable adjustment (consideration) and to submit separate, detailed cost data in support of the proposed amount. The negotiation of equitable adjustments should not delay the modification of contracts.

Note that the specific shift from MIL-Q-9858A to ISO-9000 does not in itself result in significant contractor savings in most contracts, and hence can be made on an expedited basis.

I also direct that, effective immediately, ACOs have the authority to execute class modifications, subject to receipt of necessary programmatic authorization from affected components.

The Commander, Defense Contract Management Command (DCMC) shall approve all requests for certified cost or pricing data in connection with this initiative unless such data are required by law. He will also be the focal point for implementing these efforts within DoD, and will facilitate the coordination of the change process. Tab A depicts the block change process detailing underlying assumptions, roles, and responsibilities.

The Commander, DCMC should prepare for me and for the Component Acquisition Executives a brief quarterly report that describes the progress achieved in replacing multiple government-unique management and manufacturing requirements in existing contracts with more efficient, common facility-wide practices.

Paul J. Kamunski Paul G. Kaminski

Attachment

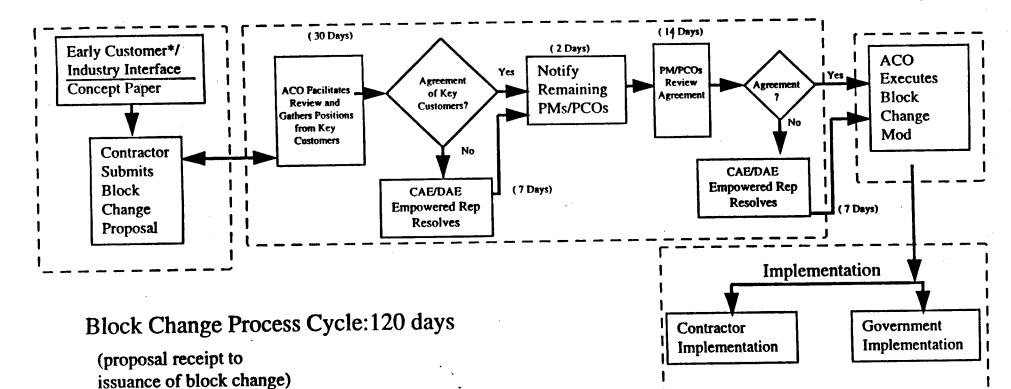
BLOCK CHANGE PROCESS OVERVIEW

Proposal Development 30 Days

Approval 60 Days

Contract Modification 30 Days

Implementation



Process Builds on Existing

Organization Structures

* Customers are the "owners" of the affected contracts, e.g program managers, PCOs, or buying agents

BLOCK CHANGE PROCESS

The block change process depicted here designates DCMC as the lead facilitator to implement plant-wide changes. The process is built on existing structures within the components and OSD and is designed to create a sense of urgency in the approval process for streamlining of specifications, standards or other processes.

PROPOSAL DEVELOPMENT

Industry is encouraged to prepare and submit concept papers for streamlining specifications and standards with emphasis on early customer involvement and interface. Once the cost and benefit of the change has been determined through this early involvement, industry shall submit block change proposals. As a minimum, the proposals should detail the proposed processes and associated metrics, rough order of magnitude cost benefit analysis, the consequent changes in government's involvement in the process and required regulatory/contractual changes.

APPROVAL

Following submittal of the proposal, the Contract Administration Office (CAO) shall determine the contractual/regulatory scope of change, confirm the component customer base impacted and, if required, organize a local management council based on the nature of the proposal. The management council should be comprised of senior level representatives from the local CAO, the cognizant Defense Contract Audit Agency (DCAA) office, the contractor and subject matter experts representing the key customers within the affected components. Notionally, the key customer base shall be comprised of customers who represent 80% of the total dollar value of affected contracts.

ROLES AND RESPONSIBILITIES

The role of the management council is to analyze the merits and cost benefits of the change. Empowerment of subject matter experts from the key customer base is critical. To minimize delay, a component team leader should be designated and granted decision authority by the CAE to represent the key customer base. Component team leaders are responsible for achieving consensus with other component team leaders, the key customer PCOs and PMs, the component team members and the CAE. The CAO should be responsible for facilitating and leading the management council. The ACO will have the contractual authority to execute all block changes. The attached diagram shows the decision process along with timelines expected of this streamlined process.

INTERNAL GOVERNMENT RESOLUTION PROCESS

The objective of this process is to resolve disagreements, facilitate consensus, elevate and resolve issues of substantial concern, and reemphasize the overall goal and objective. If there is disagreement between PM or other customers within a component, the issue must be raised to a level within the service as designated by the CAE. It there is disagreement among the components the issue must be raised to a level within the Department as designated by the DAE. Once resolved, the ACO executes the change.



DEFENSE LOGISTICS AGENCY

THE DEFENSE CONTRACT MANAGEMENT COMMAND 8725 JOHN J. KINGMAN ROAD, SUITE 2533 FT. BELVOIR, VIRGINIA 22060-6221



MEMORANDUM FOR COMMANDERS, DEFENSE CONTRACT MANAGEMENT DISTRICTS COMMANDER, DEFENSE CONTRACT MANAGEMENT COMMAND INTERNATIONAL

SUBJECT: Adoption of Common Processes at Defense Contractor Facilities

The adoption of common processes by contractors in lieu of multiple, unique DoD standards and specifications is one of the cornerstones of acquisition reform. Recently issued letters by Secretary Perry and Under Secretary Kaminski underscore the importance of accelerating this shift toward facility-wide common processes (Attachment 1). DCMC will play a pivotal role in this major initiative by both encouraging contractors to submit common process proposals and expediting their review and approval.

Common processes are intended to help reduce contractor operating costs, and contribute to cost, schedule, and performance benefits for the Government. Unlike traditional contract specific changes, process changes are intended to cross all contracts at a particular facility. For this reason, and although it is clear that both the Government and contractors can mutually benefit from the adoption of common processes, the review and approval of contractor process change proposals require special technical and cost consideration. Attachment 2 provides further guidance in each of these two areas.

Critical to the success of this effort are communication and coordination with customer buying activities and program management offices. Cost-benefit analysis must be fully explored and coordinated in order to build consensus among all parties on the concept. Each field office should establish a Management Council comprised of contractor, DCMC, DCAA, and key customer representatives in order to facilitate a timely and constructive exchange of information. The field office should work closely with the Management Council to ensure that the concept paper contains sufficient technical and cost information to permit adequate evaluation.

To help promote this initiative and also assist ACOs and other DCMC functional specialists in the review of contractor proposals, we are establishing a Block Change Management Team at HQ DCMC. A draft charter for this team is at Attachment 3. Among other tasks assigned to the team are the development of a "Road Show" package for conducting briefings across the Command, and the establishment of field level SWAT teams that will be available to assist ACOs in reviewing common process proposals.

Should there be any questions, the point of contact is Mr. Frank J. Lalumiere. He can be reached at (703) 767-2412 or DSN 427-2412.

ROBERT W. DREWES

Major General, USAF

Commander

Attachments

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6 DEC BES

MEMORANDUM FOR SECRETARIES OF THE MILITARY DEPARTMENTS
CHAIRMAN OF THE JOINT CHIEFS OF STAFF
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THE UNDER SECRETARY OF DEFENSE 3010 DEFENSE PENTAGON WASHINGTON, D.C. 20301-3010



DEC 0 8 1995

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ODUSD-4

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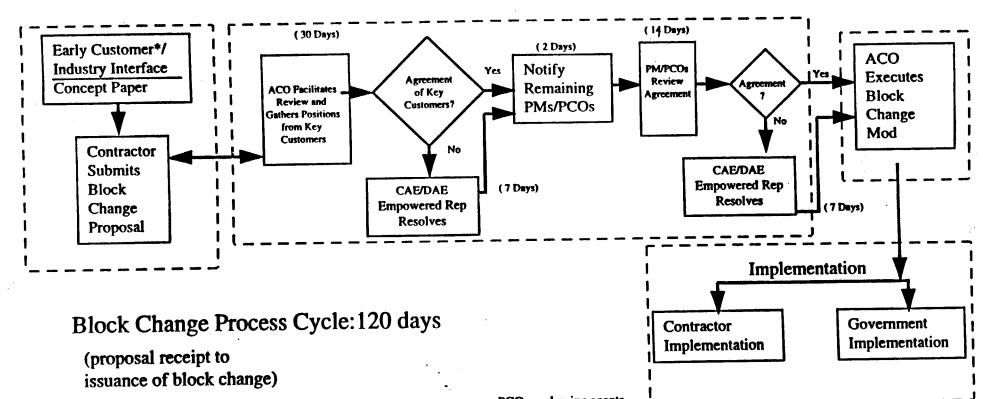
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BLOCK CHANGE PROCESS OVERVIEW

Proposal Development 30 Days

Approval 60 Days

Contract Modification 30 Days



* Customers are the "owners" of the affected contracts, e.g program managers, PCOs, or buying agents

Process Builds on Existing Organization Structures

Implementation

Common Process Block Changes

A block change is a contract modification that implements a common process across all contracts at a contractor's plant. Listed below are some key steps that should be taken to facilitate the proper review and disposition of common process proposals submitted by contractors.

- 1. CONTRACTOR/CUSTOMER/CAO INTERFACE: The Contract Administration Office (CAO) acts as the primary industry interface, proactively informing contractors about the common process approach, and advising contractors how to prepare and submit initial concept papers and more detailed proposals, if necessary. The concept paper should include a cost/benefit analysis by the contractor, sufficient to identify the rough order of magnitude of the cost and technical impact of the proposed common process change on government contracts. Contractors should be encouraged to consider any common process approach that realizes a cost schedule or performance benefit for both the contractor and the Government. The CAO will notify the key customers when a contractor volunteers to participate in the process. The CAO shall request from the largest component customer in accordance with the Service issued guidance that an individual be designated as the component team leader. After the program office/buying activity identifies the component team leader, the CAO will notify all Service customers who that individual is.
- 2. <u>CONCEPT PAPER/PROPOSAL REVIEW & EVALUATION</u>: The CAO must perform a review of the adequacy and reasonableness of the contractor's concept paper and supporting cost/benefit analysis. The concept paper should outline the proposed process and planned transition approach. Technical feasibility, cost effectiveness, and program risk are elements that should be fully explored with the contractor.

The CAO should work closely with customer buying activity and program management office customers and the contractor during review. The intent is to expedite a review and determination by the ACO as to whether the change can be approved on a no cost, block change basis. In those instances where it is determined that significant cost savings will result, the ACO, in coordination with the customers, must determine the format and amount of detail required to be included in a more formal contractor proposal. Business judgement should be used to ascertain the required level of supporting documentation.

The proposal should be reviewed by a local team of CAO technical and cost specialists, the cognizant DCAA auditor and the key customers. The contractor should participate in this review and provide any necessary, additional supporting data concurrent with the review process.

3. TECHNICAL CONSIDERATIONS:

(1) The common process should be sufficiently defined, structured, and documented to permit full evaluation. Customer buying activity programs that are affected in the various Service components or other defense/civilian agencies

must be identified.

- (2) Among other questions and issues that should be addressed during review of the contractor's proposal are:
- (i) Will implementation of the common process be advantageous to the government? Does the common process encourage the use of advanced practices, eliminate nonvalue added requirements, eliminate redundant audits, reduce oversight cost, etc.?
- (ii) How will the contractor demonstrate acceptability and reliability of the common process?
- (iii) What is the impact on the government and contractor if the common process is approved/disapproved? Has a risk analysis been performed? (The technical feasibility of the common process must be addressed in relation to the impact on such areas as quality, maintenance, and life cycle cost.)
- (iv) How will the contractor implement the common process? Will the change be phased in? How does the contractor propose to maintain quality, schedule, etc. during the transition?
- (3) The kind and degree of technical review will vary with the complexity of the processes involved. Some process changes may not have a significant impact on quality, maintenance, performance, or life cycle cost. Other process change proposals will present a myriad of technical issues requiring indepth review by contractor, DCMC, and buying activity personnel. Further, while some proposals may be readily adopted for all contracts on a facility-wide bases, other proposals may be suitable for the majority, but not all government contracts at a particular contractor facility.

For example, the proposed common process might involve the adoption of commercial packaging practices. Prior to approval on a facility-wide basis and modification of all government contracts, a technical review must confirm that there are no special packaging or packing requirements needed to satisfy cold weather storage, salt water exposure, or shelf-life expectancy, etc.

Other common process proposals may require an assessment by contractor, DCMC, and program office personnel of the impact on maintenance, supply availability, and associated costs to the government. Should a common process proposal, for example, introduce multiple variants of a component or system, the government would need some assurance that the contractor could produce sufficient, timely notification of correct configuration information for each variant, down to the piece part level. To the extent that a change introduces more parts, part numbers, or substitutes for original parts, an evaluation of the proposed change must consider whether there is sufficient technical documentation of the

parts to permit the government to identify the proper application, and whether the government can properly control and adequately disseminate the information to ensure supportability. Also, the evaluation of some proposals will require an assessment of the need to train government personnel on the changes, and the associated training costs. These kinds of complex, technical issues will surface with greater frequency in situations where end product performance specifications are proposed as substitutes for multiple military specifications. On occasion, however, they may arise during the review of common process proposals submitted by contractors.

4. COST CONSIDERATIONS:

- (1) Should the review indicate that the proposed change generates significant savings on an existing contract, consideration should be negotiated for the contract. If the resulting contract modification involves a price adjustment that exceeds the TINA threshold, certified cost and pricing data may be required per FAR 15.8. (The Commander, DCMC shall approve any ACO request for certified cost and pricing data, unless specifically required under TINA.)
- (2) If the review reveals that the implementation cost is equal to the savings realized, or the savings are immaterial on existing contracts, a block modification may be used to implement the change at no cost to the Government. Consideration should be determined based on normal business judgment which could include the absolute dollar value, as well as the dollar value of savings as measured against the overall contractor sales base. Under some circumstances, consideration flowing to the Government may be other than monetary consideration. ACOs must apply good business judgement following a full review of each concept paper or proposal and the factors involved.
- (3) In order to ensure the government realizes savings on future contracts and contract modifications, contractor proposals should address forward pricing rate reductions. The ACO and auditor should review the adequacy of the proposed rate reductions for use and incorporation in forward pricing rates.
- (4) The overall objective should be to reduce the administrative burden as much as possible, yet still satisfy customer requirements. Once the ACO has selected the appropriate course of action (block changes, individual modifications or a combination of the two), the proposed actions should be presented to the Management Council for concurrence.
- 5. MANAGEMENT COUNCIL OVERSIGHT: The Management Council structure at each CAO will help to facilitate the review and disposition of common process proposals. The Council membership should include DCMC and DCAA representatives, as well as representatives from key customer buying activities. Generally, representation on the Council should account for at least 80 percent of the customer buying activity business base impacted by the process change. Upon reaching agreement at the Management Council level, any other buying activity/program management office customers must be advised of, and concur with, the process change.

DRAFT CHARTER BLOCK CHANGE MANAGEMENT TEAM

RESPONSIBILITIES

1. Encourage contractors to submit block changes.

The DoD letters direct ACOs to encourage contractors to submit block changes. The team will be responsible for developing methods to facilitate early field office comprehension of the common process/block change policy and procedures because the first message needs to be consistent, consistently stated, and stated as quickly as possible. Specifics follow:

- A. Develop a standard letter for ACOs to use in encouraging contractors to submit common process concept papers.
- B. Develop a "road show" package for DCMC personnel (briefing charts, script. handouts, etc) that explain the DoD objective in the common/process block change policy, the purpose of block changes, the benefits to contractors, success stories from others who have already done it, the process, etc.
- C. Develop mechanisms to enable ACOs to continue to spread the message and encourage submittals after the team's departure.
- 2. Provide assistance to ACOs in processing/negotiating block changes.
- A. Stand up "SWAT teams" that are capable of assisting ACOs in processing/negotiating block changes. SWAT teams should be teams of DCMC technical and business experts who can give advice or go on-site to assist in analysis and negotiations.
- B. Facilitate interactions with customers to get approval for common processes and block changes.
- C. Develop networks to enable ACOs to find assistance after SWAT teams are disestablished.
- 3. Refine guidelines for processing/negotiating block changes.
- A. Amend/expand guidelines for processing/negotiating block changes as needed to respond to experiences and lessons learned.
 - B. Develop one book chapter for common process/block changes.

- 4. Keep DCMC Commander, OSD, and the SAEs informed of progress.
- A. Develop and submit required reports to OSD. The DoD letter requires quarterly reporting of progress from the DCMC Commanders. Develop report format, put in place collection procedures for the field, gather data, and submit reports.
- B. Submit "weeklies" (weekly status reports) to the SAEs. Reports should concentrate on the places where SAE involvement and encouragement would be worthwhile.
- 5. Monitor execution in field.
 - A. Keep in touch with CAOs to cheerlead, remove barriers, etc., but
 - B. Do not burden the field with extraneous reporting requirements.
- 6. Go out of business within 9 to 12 months.
 - A. Develop plan to institutionalize processing/negotiating block changes within dcmc.
 - B. Get plan approved and execute it.

MILESTONES

Develop standard letter	NLT 5 Jan
Develop road show	NLT 15 Jan
Do road shows	15 Jan - 15 Mar
Stand up SWAT teams	NLT 31 Dec
Develop reporting requirements	NLT 15 Jan
Rest TBD by team	

MEMBERS

Mr. Mike Vezeau (DCMC) Lead	TBD (OSD)
Ms. Jane Curtis (DCMC)	TBD (Army)
Mr. Syd Pope (DCMC)	TBD (Navy)
Mr. Dave Robertson (DCMC)	TBD (Air Force)
Ms. Josephine Ross (DCMC)	TBD (DCAA)
Mr. Mike Dudley (DCMC)	TBD (DoD IG)
MAJ Jack Econom (DCMC)	TBD (DLA)
Ms. Pat Matura (DCMC)	, ,

DCMC team members to round up TBD members. Also to augment with DCMC field personnel if necessary.